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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider  
Strategies and Guidance for Climate  
Change Adaptation.

Rulemaking 18-04-019

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO  
ADMINISTRATIVE LAW JUDGE'S RULING ORDERING FILING OF EXISTING  
VULNERABILITY ASSESSMENTS PERFORMED BY INVESTOR-OWNED  
UTILITIES**

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Pursuant to Administrative Law Judge’s (ALJ’s) Ruling Ordering the Filing of Existing Vulnerability Assessments Performed by Investor-Owned Utilities (Ruling), Southern California Edison (SCE) respectfully submits the following Response.

**I.**

**INTRODUCTION**

In the past few years, SCE’s efforts for infrastructure planning for climate change adaptation have been multi-pronged: near-term grid hardening and operational planning associated with wildfire-risk reduction, near-, mid-, and long-term climate change vulnerability assessment, and long-term planning aligned with the state’s climate goals and deep decarbonization. Emergent events and long-term objectives that need near-term actions have required us to prioritize the breadth of identified work associated with climate change adaptation and infrastructure planning. Here, SCE is providing links to recent, public, and final documents, along with brief descriptions, to best inform the public record for public comment in this rulemaking. SCE is currently in the process of performing a further climate vulnerability assessment to develop an adaptation framework including infrastructure planning and

community engagement. SCE can share additional public assessments and analyses after they are completed.

## **II.**

### **SCE DOCUMENTS RESPONSIVE TO THE SUBJECT RULING**

#### **A. Grid Safety and Resiliency Program Application**

Wildfires are one of the highest risks driven by climate change that are having near-term impacts on our communities. SCE's Grid Safety and Resiliency Program (GS&RP) is a comprehensive program whose core objectives are to bolster fire prevention and suppression activities and enhance system resiliency. The GS&RP Application describes specific actions that SCE is taking, or plans to take, to fortify or alter infrastructure to reduce the risk of wildfire on the grid, accommodating for weather and climate change conditions. These actions include grid hardening efforts such as new pole design and construction standards appropriate for expected conditions in high fire risk areas to enhance the resiliency of our infrastructure. SCE is also investing in situational awareness tools such as weather stations to enable more detailed weather forecasting and engineering advances such as infrared technology to potentially identify equipment before it fails.

- *See Application of Southern California Edison Company (U 338-E) for Approval of its Grid Safety and Resiliency Program (filed September 10, 2018), available here: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M226/K778/226778197.pdf>.*

#### **B. Wildfire Mitigation Plan**

Incorporating and building upon the programmatic goals of GS&RP, SCE's 2019 Wildfire Mitigation Plan (WMP) seeks to fortify the electric system against the threat of extreme conditions driven by climate change and the impacts of wildfires and greatly reduce fire ignitions caused by utility infrastructure. WMP enumerates specific strategies and programs to harden the grid, such as replacing bare overhead conductors with covered conductors and installing special fuses to quickly reduce ignition points and isolate problems on the system.

- See Decision on Southern California Edison Company's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill of 901 (issued June 4, 2019), available here: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M298/K487/298487636.pdf>.
- See SCE's 2019 Wildfire Mitigation Plan (filed February 6, 2019), available here: <http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=263645320>.

**C. 2018 Risk Assessment Mitigation Phase Report**

Sections of SCE's 2018 Risk Assessment Mitigation Phase (RAMP) report covering Building Safety (Chapter 4), Hydro Asset Safety (Chapter 8), Wildfire (Chapter 10), and Climate Change (Chapter 12) describe assessment of certain climate-change related risks.

SCE noted the impact of extreme wind as a driver to building safety in Chapter 4, "Building Safety." In response, SCE evaluated the installation of window film to improve the window's ability to resist objects penetrating and/or shattering. These mitigations were targeted at building sites situated in extreme wind zones.

In Chapter 8 "Hydro Asset Safety," SCE discussed the risks associated with extreme precipitation events and periods of prolonged drought on SCE's portfolio of hydro assets. In the technical Appendix to this chapter, SCE discussed the potential impact on hydro operations from increasing frequency and magnitude of extreme flooding based on long-term climate change scenarios.

In Chapter 10 "Wildfire," the chapter's discussion of risk is largely aligned with SCE's GS&RP filing, addressing the increased risk associated with wildfires due to climate change.

In Chapter 12 "Climate Change," SCE's discussed ongoing efforts to examine the near-, medium-, and long-term vulnerabilities and impacts of climate change and extreme weather events. In the near term, SCE's analysis focused on the risk associated with additional energy procurement under extreme heat events. In the Appendix to this chapter, SCE included a high-level vulnerability assessment. This document evaluates the long-term risk posed by climate change from now until 2050.

- See Southern California Edison Company's (U 338-E) 2018 Risk Assessment and Mitigation Phase Report (filed November 15, 2018), available here: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M259/K972/259972600.pdf>.

- Subsequently, SCE filed Southern California Edison Company's (U 338-E) Amendment to Portions of 2018 Risk Assessment and Mitigation Phase Report (March 14, 2019), which updated certain numerical items within two chapters, including Chapter 10 – Wildfire. This is available here: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M292/K932/292932575.pdf>.

#### **D. 2016 SCE Department of Energy Report**

The 2016 SCE Climate Impact Analysis and Resilience Planning Report and the Progress Update Report (collectively, the "SCE 2016 DOE Report") used existing literature to research potential climate hazards that could affect electric utility equipment within select geographies in SCE's service territory. While the SCE 2016 DOE Report provided examples of how to forecast climate impacts throughout the system, it did not identify actual asset locations on SCE's system where climate hazards may cause equipment failure.

- See "SCE's 2016 DOE Report" in Southern California Edison Company's (U 338-E) Comments on Administrative Law Judge's Ruling Regarding June 24, 2019 Working Group Topic 4 Report, Attachment A (filed July 12, 2019), available here: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M309/K871/309871167.pdf>.

#### **E. Pathway 2045**

California has set a goal to achieve carbon neutrality by 2045 to reduce the threat of climate change. Earlier this month, SCE released the Pathway 2045 whitepaper, which provides a feasible and low-cost blueprint for reaching California's ambitious goals to achieve carbon neutrality by 2045, by using 100% clean electricity, electrifying 75% of transportation and 70% of buildings, and using low-carbon fuels for technologies not yet viable for electrification. Pathway 2045 also highlights many of the immediate steps needed to achieve this vision, such as developing new electric system designs and standards to withstand more extreme weather events brought on by climate change impacts. As electrification increases and more customers come to rely on the grid, efforts to fortify and strengthen the grid today, along with system designs that accommodate increasing flexibility and more monitoring, should reduce the risk of climate change impacts.

- See Pathway 2045: Update to the Clean Power and Electrification Pathway” (published November 2019), available here:  
[https://newsroom.edison.com/internal\\_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/201910/201911-pathway-to-2045-white-paper.pdf](https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/201910/201911-pathway-to-2045-white-paper.pdf).

### **III. CONCLUSION**

SCE looks forward to continuing the dialogue with the Commission and the Working Group on this topic.

Respectfully submitted,

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